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6 Attorneys for Defendants Volkswagen Group of  
 America, Inc.

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 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 DYLAN TODD and EMILY TODD,  
 individuals;

11 Plaintiffs,

12 v.

13 VOLKSWAGEN GROUP OF AMERICA,  
 INC., a corporation; VOLKSWAGEN  
 14 AKTIENGESELLSCHAFT, a business  
 entity, form unknown; AND DOES 1  
 15 through 20, inclusive,

16 Defendants.

Case No.: 2:16-cv-01735-RFB-PAL

**STIPULATION AND PROPOSED ORDER  
 TO EXTEND TIME**

17 Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), by and  
 18 through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and  
 19 Plaintiffs Dylan Todd and Emily Todd (“Plaintiffs”), by and through the undersigned counsel of  
 20 record, the law firm of Hyde & Swigart, hereby stipulate and agree as follows:

21 In order to conserve the resources of the parties, their counsel and the judiciary, Defendant  
 22 shall have thirty (30) days to answer or otherwise respond to Plaintiff’s Complaint following  
 23 entry of this Court’s decision on Defendant’s Motion to Stay (ECF No. 4).

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
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<p>Dated this 8th day of August, 2016.</p> <p>BROWNSTEIN HYATT FARBER SCHRECK, LLP</p> <p>By: <u>/s/ Jeffrey S. Rugg</u> JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135</p> <p>Attorneys for Defendants Volkswagen Group of America, Inc.</p>	<p>Dated this 8th day of August, 2016.</p> <p>HYDE &amp; SWIGART</p> <p>By: <u>/s/ Sara Khosroabadi</u> SARA KHOSROABADI, ESQ. 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022</p> <p>Attorneys for Plaintiffs Dylan Todd and Emily Todd</p>
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**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: \_ August 9, 2016

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
702.382.2101

**CERTIFICATE OF SERVICE**

1  
2 Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing  
3 Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK,  
4 LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME**  
5 was served via electronic service on the 8th day of August, 2016 and to the addresses shown  
6 below:

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15 Todd

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/s/ Karen Wiehl  
An employee of Brownstein Hyatt Farber  
Schreck, LLP